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## TEMPORARY DRAFT

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Another consideration to be made in permitting the Magcorp plant site is the degree of environmental impact the site is currently having. Reclaiming and decommissioning of the site would be extremely beneficial environmentally. Apparently, to my knowledge, the operator has no plans for a major cleanup of the site once the plant is no longer needed.

A major set-back to permitting the site is the fact that the mine was permitted sometime ago and the plant site was not considered. I also believe the plant site was developed prior to our statute. It is very difficult to develop a reclamation plan for a pre-existing site, because reclamation and mitigation of environmental impacts were not planned for during the original development of this site.

Another hurdle to the reclamation of this site would be the decommissioning of the various reservoirs, discharge facilities, waste piles, contaminated soils, chemical holding facilities on site, etc. To do the job properly would require a substantial investment. I believe we would require a good deal of help from DEQ to generate an acceptable decommissioning and reclamation plan.

To permit this site would require a substantial investment of our time and energy. I suggest we place it on some type of formalized list to be permitted sometime in the future, when time permits. I have attached an October 24, 1991 memo from Lowell which discusses this approach to our problem.

Perhaps we could initiate the process by asking Magcorp for any decommissioning plans they currently maintain with DEQ, for the site. Also, Magcorp may have plans of their own for moth-balling or retiring the site.

I calculated some acreages off the aerial photo supplied to us by Magcorp: the mine area encompasses approximately 86 acres; the plant area encompasses approximately 446 acres (magnesium brine solar pond included); the discharge pond encompasses approximately 308 acres; and the magnesium brine solar pond encompasses 56 acres. The total acreage for plant, discharge pond and mine would be approximately 840 acres. Given our \$3,000/acre program average the surety for the mine and plant would equal \$2,520,000. Because of the expense of decommissioning such a site this would probably not be a high figure.